

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

May 14, 2021

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

LARRY JAY HALLS,

Defendant.

NO: 4:21-CR-6016-RMP-1

AMENDED STIPULATED  
PROTECTIVE ORDER REGARDING  
IDENTIFICATION OF MINOR  
VICTIMS PURSUANT TO  
18 U.S.C. § 3509

The Court has received and reviewed the Stipulation for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509, filed by the parties in the above-captioned matter, and is fully advised.

GOOD CAUSE HAVING BEEN SHOWN, the Court hereby **ORDERS** that the Amended Stipulation for Protective Order Regarding Identification of Minor Victims Pursuant to 18 U.S.C. § 3509 filed by the parties, **ECF No. 21**, is **GRANTED**. The parties' Stipulation filed at **ECF No. 20** is **DENIED AS MOOT**.

1. IT IS FURTHER ORDERED that the privacy protection measures  
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IDENTIFICATION OF MINOR VICTIMS PURSUANT TO  
18 U.S.C. § 3509 ~ 1

1 mandated by 18 U.S.C. § 3509(d), which apply when a case involves a person  
2 under the age of eighteen years who is alleged to be a victim of a crime of sexual  
3 exploitation, or a witness to a crime committed against another person, apply to  
4 this case.

5 2. IT IS FURTHER ORDERED that all persons acting in this case in a  
6 capacity described in 18 U.S.C. § 3509(d)(1)(B), shall:

- 7 a. Keep all documents that disclose the names, identities, or any  
8 other information concerning minors in a secure place to which  
9 no person who does not have reason to know their contents has  
10 access;
- 11 b. Disclose such documents or the information in them that  
12 concerns minors only to persons who, by reason of their  
13 participation in the proceeding, have reason to know such  
14 information;
- 15 c. Not permit Defendant himself to review discovery outside the  
16 presence of defense counsel or a defense investigator;
- 17 d. Not permit Defendant to keep discovery in his own possession  
18 outside the presence of defense counsel or a defense  
19 investigator; and
- 20 e. Not permit Defendant to keep, copy, or record the identities of  
21 any minor or victim identified in discovery in this case.

1           3.     IT IS FURTHER ORDERED that all papers to be filed in Court that  
2 disclose the names or any other information identifying or concerning minors shall  
3 be filed under seal without necessity of obtaining a Court order, and that the person  
4 who makes the filing shall submit to the Clerk of the Court:

5                 a.     The complete paper to be kept under seal; and

6                 b.     The paper with the portions of it that disclose the names or  
7                         other information identifying or concerning children redacted,  
8                         to be placed in the public record.

9           4.     IT IS FURTHER ORDERED that the parties and the witnesses shall  
10 not disclose minors' identities during any proceedings connected with this case.  
11 The parties and witnesses will refer to alleged minor victims only by using agreed-  
12 upon initials or pseudonyms (e.g., "Minor Victim 1"), rather than their bona fide  
13 names, in motions practice, opening statements, during the presentation of  
14 evidence, in closing arguments, and during sentencing.

15           5.     IT IS FURTHER ORDERED that the government may produce  
16 discovery to the defense that discloses the identity and images of alleged minor  
17 victims in this case, in order to comply with the government's discovery  
18 obligations. Defendant, the defense team, Defendant's attorneys and investigators,  
19 and all of their externs, employees, and/or staff members, shall keep this  
20 information confidential as set forth above.

21           6.     IT IS FURTHER ORDERED that this ORDER shall apply to any

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